

Exhibit 30

Deposition of Scott Coker
(August 3, 2017) (excerpted)

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)	
FITCH, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:15-cv-01045-RFB-(PAL)
)	
ZUFFA, LLC, d/b/a Ultimate)	
Fighting Championship and)	
UFC,)	
)	
Defendant.)	
_____)	

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF

SCOTT COKER

LOS ANGELES, CALIFORNIA

AUGUST 3, 2017

9:09 a.m.

REPORTED BY:
CYNTHIA K. DuRIVAGE, CSR #451
JOB NO. 51251

<p style="text-align: right;">82</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 how they did their deals were, but you're not welcome</p> <p>3 to sponsor any fighters that are outside of UFC back</p> <p>4 at that time.</p> <p>5 Q. Sorry, what time was that?</p> <p>6 A. You know, from 2007, maybe, to 2011.</p> <p>7 Q. Around the time of the sale?</p> <p>8 A. Correct.</p> <p>9 Q. Is there anything else that you can think</p> <p>10 of regarding sponsors where, you know, if you weren't</p> <p>11 with -- if you were sponsoring another organization,</p> <p>12 you weren't with the UFC?</p> <p>13 A. I can't.</p> <p>14 Q. Other than sponsors, what other ways, if</p> <p>15 any, were you either with the UFC or not with the</p> <p>16 UFC?</p> <p>17 A. I'd say fighter contracts, sponsorships.</p> <p>18 I think they held that, you know, in</p> <p>19 venues, maybe, they held the same feeling towards</p> <p>20 other venues. That's all I can think of right now.</p> <p>21 Q. With respect to fighter contracts, this</p> <p>22 notion of you're either with the UFC or you're not,</p> <p>23 how did that manifest itself?</p> <p>24 A. I mean, and maybe that was the wrong way to</p> <p>25 phrase it because, really, it's like when you have a</p>	<p style="text-align: right;">84</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 as successful MMA promoter?</p> <p>3 A. No.</p> <p>4 Q. And how did the -- just getting back to the</p> <p>5 EA game, how did that game ultimately do</p> <p>6 commercially, do you know?</p> <p>7 A. I'm not sure.</p> <p>8 Q. Were there fighters -- I'll withdraw that.</p> <p>9 We talked a little bit this morning about</p> <p>10 Affliction. Do you recall that testimony?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And I think you testified that there</p> <p>13 came a time when Affliction stopped promoting mixed</p> <p>14 martial arts events.</p> <p>15 Do you recall that?</p> <p>16 A. Yes.</p> <p>17 Q. Do you recall approximately when Affliction</p> <p>18 stopped promoting mixed martial arts events?</p> <p>19 A. 2009.</p> <p>20 Q. Let me -- do you recall -- withdraw that.</p> <p>21 Did you communicate with Ms. Knapp about</p> <p>22 Affliction's decision to stop promoting mixed martial</p> <p>23 arts events?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. What do you recall about those</p>
<p style="text-align: right;">83</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 contract with a certain company, then that's who</p> <p>3 you're obligated to fight for.</p> <p>4 They weren't going to let any of those</p> <p>5 athletes come over and fight, you know, in</p> <p>6 Strikeforce, you know, or any other league.</p> <p>7 So I think that -- to me, I don't think</p> <p>8 that's unnatural.</p> <p>9 Q. Well, I think you testified earlier that</p> <p>10 Strikeforce would allow its fighters --</p> <p>11 A. Yes.</p> <p>12 Q. -- to fight other promotions, right?</p> <p>13 A. Yes.</p> <p>14 Q. That didn't hurt Strikeforce's business,</p> <p>15 did it?</p> <p>16 A. That's correct. And that was something</p> <p>17 that was really just my decision. In talking to the</p> <p>18 fighters, it was something that was important to</p> <p>19 them, so we granted them a hall pass to go and</p> <p>20 compete in Japan.</p> <p>21 Q. But did Strikeforce's decision to allow its</p> <p>22 fighters to fight in other promotions make it more</p> <p>23 difficult just for Strikeforce to run its business?</p> <p>24 A. No.</p> <p>25 Q. Did it impair Strikeforce's ability to be</p>	<p style="text-align: right;">85</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 communications?</p> <p>3 A. We talked about, you know, what they were</p> <p>4 going to do with Josh Barnett not being able to pass</p> <p>5 the California State Athletic Commission testing.</p> <p>6 And then, we talked about a possible replacement,</p> <p>7 which they are asking for us to send Brett Rogers</p> <p>8 over. That's part of that email that you're looking</p> <p>9 at.</p> <p>10 We had a contract with Brett Rogers. He</p> <p>11 had just beat Arlovski, so he had a little bit of</p> <p>12 heat on him. And Fedor's opponent just drops out.</p> <p>13 So Todd was asking Shannon to ask me about having</p> <p>14 Brett Rogers step in.</p> <p>15 At that time, I contacted Showtime</p> <p>16 television, and I said: Here's the scenario. It's a</p> <p>17 good opportunity for Brett. And it could be a good</p> <p>18 opportunity for us. And Ken Hershman, who was</p> <p>19 president of sports at that time, asked us not to do</p> <p>20 it because he didn't see any upside if Brett would</p> <p>21 have lost coming off a big win. We didn't have Fedor</p> <p>22 under contract at that time. So what is the upside</p> <p>23 for us.</p> <p>24 So we decided know not to let our fighter</p> <p>25 go to fight in the Affliction show against Fedor</p>

<p style="text-align: right;">86</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 because of those reasons.</p> <p>3 Q. And what did you think of Affliction's --</p> <p>4 sorry.</p> <p>5 With respect to Rogers, you mentioned --</p> <p>6 with respect to Rogers, you said that there was a</p> <p>7 little bit of heat; is that correct?</p> <p>8 A. Yeah. What I mean by heat is a promoter</p> <p>9 term in that he had just come off of a very big win</p> <p>10 against Andrei Arlovski, which he was the underdog.</p> <p>11 And so, now he was kind of Cinderella story in</p> <p>12 beating Andrei on a big Showtime event. And now, he</p> <p>13 was poised to take the next step up in a big fight</p> <p>14 with us on either Showtime TV or CBS.</p> <p>15 Q. And what did you think of Affliction's</p> <p>16 decision to not promote live MMA events?</p> <p>17 A. To be honest, I was not surprised.</p> <p>18 Q. And why were you not surprised?</p> <p>19 A. Because anytime you have people enter this</p> <p>20 industry that don't really know this industry and</p> <p>21 come in as fans or in this case an apparel company</p> <p>22 that wanted to be a fight promoter, they don't</p> <p>23 understand that it's a much different game than what</p> <p>24 it looks like on the outside looking in.</p> <p>25 So you know, they try to get some good</p>	<p style="text-align: right;">88</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 sell tickets, and you need to drive TV ratings or</p> <p>3 pay-per-views.</p> <p>4 Q. Okay. And what do you need to do that?</p> <p>5 A. You need to have a good fight roster, you</p> <p>6 need to have a good marketing place, a digital plan,</p> <p>7 a social plan. You need to have full integration,</p> <p>8 you know, from the top down of like everybody being</p> <p>9 on the same page, so to speak.</p> <p>10 But at the end of the day, if you can't</p> <p>11 sell tickets, you're not in the business. If you</p> <p>12 can't drive TV ratings, you're not in the business.</p> <p>13 Q. And what helps you as an MMA promoter to</p> <p>14 sell tickets or drive ratings?</p> <p>15 A. I believe the fighter is the key. They are</p> <p>16 number one in this industry. And not everybody might</p> <p>17 believe that. They might believe that, you know,</p> <p>18 it's the league, but I've always felt that the</p> <p>19 fighters were number one.</p> <p>20 And from there, you have something to work</p> <p>21 with and something to build. It's like a star in a</p> <p>22 movie. You have a superstar signed to a movie, now</p> <p>23 have you something to build off of, right? And</p> <p>24 that's the same thing with the fighter.</p> <p>25 Q. Can you have a successful MMA promotion</p>
<p style="text-align: right;">87</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 advisers. I even tried to help them myself. I went</p> <p>3 down and flew down to Todd, and I sat with Todd for</p> <p>4 six hours early on, and I gave him a list of things</p> <p>5 to do, of things not to do. And I think he just</p> <p>6 flipped -- flipped the list and did everything that</p> <p>7 he could to, you know, to -- that was incorrect. And</p> <p>8 then, all the things that I told him to do, he didn't</p> <p>9 do.</p> <p>10 Q. And what are the things that you believe</p> <p>11 are needed to make a successful MMA promotion?</p> <p>12 MR. KELLY: Objection --</p> <p>13 THE WITNESS: There has -- sorry.</p> <p>14 MR. KELLY: Let me just object. Vague and</p> <p>15 ambiguous as to time.</p> <p>16 MR. DELL'ANGELO: So I'll withdraw the</p> <p>17 question.</p> <p>18 BY MR. DELL'ANGELO:</p> <p>19 Q. From the time period of 2008 to March of</p> <p>20 2011, did you have a view as to what was necessary to</p> <p>21 make a successful MMA promotion?</p> <p>22 A. Yes. In this business, there's two things</p> <p>23 you need to do.</p> <p>24 Q. Okay.</p> <p>25 A. And it's you need to put butts in seats and</p>	<p style="text-align: right;">89</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 without fighters?</p> <p>3 A. No.</p> <p>4 Q. In your experience, is having higher</p> <p>5 quality fighters better for growing and building a</p> <p>6 successful MMA promotion?</p> <p>7 A. Yes.</p> <p>8 Q. In your experience, what would happen to a</p> <p>9 promotion if it didn't have access to, you know,</p> <p>10 better quality fighters?</p> <p>11 A. In my opinion, I think a league can still</p> <p>12 survive as long as the expectation or the revenue</p> <p>13 streams that you think you're going to create are</p> <p>14 equal to the fighters that you're bringing in.</p> <p>15 So example would be if you're signing Fedor</p> <p>16 and you're signing the Cung Les of the world at that</p> <p>17 time and you're signing, you know, big-name fighters</p> <p>18 like Frank Shamrock, but, you know, you're in a small</p> <p>19 venue selling 3,000 seats, you're not going to be in</p> <p>20 business very long. You have to have a balance in</p> <p>21 your expectation.</p> <p>22 But if you're selling out big arenas and</p> <p>23 you have a TV deal, you have sponsors, now you're in</p> <p>24 the game. And that's the difference.</p> <p>25 Q. In your experience, would you sell out --</p>

<p style="text-align: right;">90</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 as an MMA promoter, would you be likely to sell out</p> <p>3 large arenas or venues with unknown --</p> <p>4 A. No.</p> <p>5 Q. -- fighters?</p> <p>6 A. No.</p> <p>7 Q. How about with fighters that are not</p> <p>8 recognized or fighters that have a very low rank, for</p> <p>9 example?</p> <p>10 MS. GRIGSBY: Objection to form.</p> <p>11 THE WITNESS: I mean, low rank, to me,</p> <p>12 doesn't mean that you can't be a star. So you can be</p> <p>13 ranked 3 or 4 in the world, but -- the flip side of</p> <p>14 that is you can be ranked 3 or 4 in the world,</p> <p>15 doesn't mean you are a star.</p> <p>16 So you can be ranked, you know, 10, 12, 14</p> <p>17 in the world and still be a big star and still</p> <p>18 attract people and still draw TV ratings.</p> <p>19 BY MR. DELL'ANGELO:</p> <p>20 Q. Okay. But in your experience, at least at</p> <p>21 that time, was a higher ranked fighter more likely to</p> <p>22 attract -- you know, enable a promoter to put butts</p> <p>23 in seats, as you so say, or sell pay-per-views?</p> <p>24 MS. GRIGSBY: Objection to form, compound.</p> <p>25 THE WITNESS: I think that -- it's a</p>	<p style="text-align: right;">92</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 fighters to put them on pay-per-view, then you don't</p> <p>3 have a product to sell.</p> <p>4 Q. And what do you mean by the right fighters</p> <p>5 in that context?</p> <p>6 A. Again, it goes to -- you know, sometimes</p> <p>7 the personality outweighs the ranking.</p> <p>8 For instance, like Zuffa, they had a fight</p> <p>9 with the pro wrestler guy, not Brock but the other</p> <p>10 guy. I forgot his name. But he's never fought</p> <p>11 before, was trying to become a fighter, and he fought</p> <p>12 and it was a big draw because he had such a big</p> <p>13 following of fan base. So, you know, to me, it can</p> <p>14 kind of go -- you know, that can go both ways.</p> <p>15 (Exhibit 7 was marked for</p> <p>16 identification by the reporter.)</p> <p>17 BY MR. DELL'ANGELO:</p> <p>18 Q. Let's take a look back at Exhibit 7, the</p> <p>19 email that I've put before you there.</p> <p>20 A. Exhibit 7?</p> <p>21 Q. I'm sorry. I didn't actually hand you</p> <p>22 that.</p> <p>23 For the record, Exhibit 7 is a two-page</p> <p>24 series of emails spanning ZFL-2469204 through</p> <p>25 2469205.</p>
<p style="text-align: right;">91</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 difficult question to answer because I've had other</p> <p>3 fighters that were not ranked, Cung Le being one of</p> <p>4 them, but he was a big star, drew big TV ratings and</p> <p>5 drew, you know, butts in the seats.</p> <p>6 So, you know, I think it depends on the</p> <p>7 person.</p> <p>8 And then, I've had other fighters that are</p> <p>9 ranked 1, 2, 3, but they don't move the deal that</p> <p>10 well. So it's a hard question to answer.</p> <p>11 BY MR. DELL'ANGELO:</p> <p>12 Q. So what makes a -- well, at least with</p> <p>13 respect to Cung Le, though, is it fair to say that</p> <p>14 his notoriety helped to make for a successful</p> <p>15 promotion when he was -- or a successful, I guess,</p> <p>16 bout when he was fighting?</p> <p>17 A. Yeah, I think -- I mean, I think Cung was a</p> <p>18 product of being a great martial artist, and he had a</p> <p>19 great promotion vehicle behind him.</p> <p>20 Q. And what is it, in your experience, that</p> <p>21 makes a successful pay-per-view event in the mixed</p> <p>22 martial arts?</p> <p>23 A. That the fighters are No. 1.</p> <p>24 Q. What do you mean No. 1?</p> <p>25 A. I mean, if you don't have the right</p>	<p style="text-align: right;">93</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Mr. Coker, would you take a look at</p> <p>3 Exhibit 7, and tell me if you recognize that</p> <p>4 document.</p> <p>5 A. That's pretty funny. I can't read the</p> <p>6 small print.</p> <p>7 Q. All right. So --</p> <p>8 A. I can -- I can comment on the first.</p> <p>9 My comment to Shannon was: "Tell Apy,"</p> <p>10 because that was a time when we were talking about</p> <p>11 the demise of Affliction, and we were talking to Apy</p> <p>12 about Fedor and Vadim about Fedor.</p> <p>13 Q. And did you write the email at the top of</p> <p>14 the page of Exhibit 8, the one dated July 24, 2009 at</p> <p>15 10:26:43 p.m.</p> <p>16 A. Yes.</p> <p>17 Q. Did you write that in the regular course of</p> <p>18 your business as president and CEO of Strikeforce?</p> <p>19 A. Yes.</p> <p>20 Q. And you wrote it to Shannon Knapp?</p> <p>21 A. Yes.</p> <p>22 Q. She was employed by Strikeforce at the time</p> <p>23 as well?</p> <p>24 A. Yes.</p> <p>25 Q. What were you communicating to Ms. Knapp in</p>

<p style="text-align: right;">94</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 your 10:26:43 p.m. employee in Exhibit 7?</p> <p>3 A. I had learned that the UFC had done a deal</p> <p>4 with Affliction and some type of purchasing of their</p> <p>5 assets.</p> <p>6 But the Fedor contract was not assignable</p> <p>7 is what I recall. So Fedor was out there.</p> <p>8 So it was my email to Shannon Knapp</p> <p>9 start -- or, to call Apy and start the process of --</p> <p>10 these are the reasons why Fedor should come here and</p> <p>11 support us because, if not, it's going to be a</p> <p>12 one-league world. And my belief is always that when</p> <p>13 there's a one anything in an industry then it's not a</p> <p>14 healthy industry, that you know, fighter purses will</p> <p>15 go down, they'll control, you know, the purse</p> <p>16 climate, so to speak, and it's not going to be good</p> <p>17 for all the fighters and trainers and managers.</p> <p>18 Q. Do you see where your email begins "LOL,"</p> <p>19 do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And it ends -- do you see where the</p> <p>22 initials "SC" are, kind of at the end of the text in</p> <p>23 that first email, the email at the top of the page?</p> <p>24 A. Where it ends in, where it says, "deal</p> <p>25 points"?</p>	<p style="text-align: right;">96</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 to us and talked to us about doing some type of deal,</p> <p>3 but you know, they had other options other than just,</p> <p>4 you know, selling their assets to the UFC.</p> <p>5 Q. Is it your understanding that they needed</p> <p>6 to sell their assets to the UFC in order to be let</p> <p>7 back in as a UFC sponsor?</p> <p>8 MS. GRIGSBY: Objection, foundation.</p> <p>9 THE WITNESS: That, I do not know.</p> <p>10 BY MR. DELL'ANGELO:</p> <p>11 Q. You talk about in your email about battling</p> <p>12 the UFC.</p> <p>13 What did Strikeforce need to battle the</p> <p>14 UFC?</p> <p>15 A. I mean, you know, we were the up-and-coming</p> <p>16 league, and they were the established league, No. 1</p> <p>17 in the marketplace. And, you know, like the</p> <p>18 situation with Fedor -- like Fedor later or the</p> <p>19 Tapout deal and competing with fighters. I mean, it</p> <p>20 was -- it was a -- you know, it was a bit of a</p> <p>21 struggle at some points.</p> <p>22 Q. And what kind of fighters did Strikeforce</p> <p>23 need to have in its stable to battle the UFC?</p> <p>24 MS. GRIGSBY: Objection to form.</p> <p>25 THE WITNESS: You need to have big names,</p>
<p style="text-align: right;">95</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. Yes. Would you just read "LOL" to your</p> <p>3 email beginning from "LOL" to "SC," please.</p> <p>4 A. Yeah. "You might as well tell Bob Cook</p> <p>5 now --" and I'm not sure what I was referring to --</p> <p>6 MR. KELLY: He's asking you to read from</p> <p>7 the first "LOL" there at the top.</p> <p>8 THE WITNESS: I'm sorry.</p> <p>9 MR. DELL'ANGELO: Thank you.</p> <p>10 THE WITNESS: "Tell Apy that Affliction</p> <p>11 took the easy way out. now it's UFC</p> <p>12 and Strikeforce. If you can't</p> <p>13 battle these guys, it's over for the</p> <p>14 MMA industry. UFC will be the only</p> <p>15 one left. We're the last chance.</p> <p>16 Otherwise, fighters' purses will go</p> <p>17 down if UFC is the only one -- is</p> <p>18 the only one, period. We're Luke</p> <p>19 Skywalker and UFC is Darth Vader and</p> <p>20 the Death Star, LOL."</p> <p>21 BY MR. DELL'ANGELO:</p> <p>22 Q. And so, what did you mean that Affliction</p> <p>23 took the easy way out in your email?</p> <p>24 A. Affliction could have had other choices.</p> <p>25 They could have kept promoting. They could have come</p>	<p style="text-align: right;">97</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 and you need to have fighters that do two things,</p> <p>3 which is, you know, put butts in seats, sell tickets,</p> <p>4 and drive TV ratings or pay-per-view ratings. Those</p> <p>5 are the fighters that we need.</p> <p>6 BY MR. DELL'ANGELO:</p> <p>7 Q. And what was your opinion of what would</p> <p>8 have happened if Strikeforce wasn't able to get those</p> <p>9 types of fighters in light of the fact that</p> <p>10 Affliction had taken the easy way out?</p> <p>11 A. I mean, I remember being concerned about,</p> <p>12 you know, the health of Strikeforce and the health of</p> <p>13 the MMA industry at this time because I feel like if</p> <p>14 they would have landed Fedor and some other -- they</p> <p>15 did take some top fighters from Affliction. But, you</p> <p>16 know, Fedor was the fighter that I wanted to recruit,</p> <p>17 and that's what this email is about.</p> <p>18 Q. And what did you mean that now it's UFC and</p> <p>19 Strikeforce?</p> <p>20 A. Like basically, you know, they -- they were</p> <p>21 No. 1 in the marketplace, and you know, it was up to</p> <p>22 us to go and compete and to grow our company to</p> <p>23 compete with the UFC.</p> <p>24 Q. And what did you mean when you wrote, "If</p> <p>25 we can't battle these guys, it's over for the MMA</p>

<p style="text-align: right;">98</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 industry"?</p> <p>3 A. You know, I've always felt that an industry</p> <p>4 to be healthy -- I think I'm repeating, but an</p> <p>5 industry to be healthy, you need two players, you</p> <p>6 need Pepsi, you need Coke; you need Avis, you need</p> <p>7 Hertz. Because if there's only one person</p> <p>8 controlling the marketplace, then fighter persons go</p> <p>9 down, you know, the industry is controlled by one</p> <p>10 say. And I don't think that ever is a situation</p> <p>11 where an industry can be healthy where there's only</p> <p>12 one player.</p> <p>13 Q. Do you think that that could be -- if there</p> <p>14 was only one player that that could be -- hurt</p> <p>15 fighters?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And what other ways -- what ways</p> <p>18 would it hurt the fighters, in your opinion?</p> <p>19 A. Well, the biggest way is think about if</p> <p>20 there's only one place to have a job, and then,</p> <p>21 there's only a certain amount of slots available to</p> <p>22 have employment, the fighter purses naturally would</p> <p>23 go down because now you're in control of the</p> <p>24 marketplace. So now, you can dictate what an entry</p> <p>25 fighter level would get and what a mid-tier fighter</p>	<p style="text-align: right;">100</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 help us drive ratings on CBS and eventually drive</p> <p>3 ratings on pay-per-view.</p> <p>4 BY MR. DELL'ANGELO:</p> <p>5 Q. So is it fair to say that you believe that</p> <p>6 overall, attracting a fighter like Fedor would be,</p> <p>7 you know, good for Strikeforce's business?</p> <p>8 A. Yes.</p> <p>9 Q. I think you testified a little earlier</p> <p>10 today -- and I'm sorry, let me just withdraw that.</p> <p>11 Is that generally true with other fighters</p> <p>12 that have heat on them, as you described it, to use</p> <p>13 that term?</p> <p>14 A. Could you repeat the question one more</p> <p>15 time.</p> <p>16 Q. Sure. So I wanted to know if that was also</p> <p>17 generally true with respect to Strikeforce's ability</p> <p>18 to attract other fighters that had heat on them, as</p> <p>19 you used that term?</p> <p>20 A. Yes. It would have been a great statement</p> <p>21 and a great recruiting tool.</p> <p>22 Q. So getting a fighter like Fedor, you</p> <p>23 believed, would have helped Strikeforce recruit or</p> <p>24 attract other quality fighters?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">99</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 would get, what a top-tier fighter would get. And</p> <p>3 you kind of control the marketplace at that point.</p> <p>4 Q. I think you testified that you wanted to</p> <p>5 pursue Fedor at this time?</p> <p>6 A. At this time, yes.</p> <p>7 Q. So did you think that Fedor was an</p> <p>8 important fighter for Strikeforce to try to get in</p> <p>9 its roster?</p> <p>10 A. Yes.</p> <p>11 Q. And why?</p> <p>12 A. Being undefeated for ten years, coming off</p> <p>13 of a big fight where he knocked out Andrei Arlovski.</p> <p>14 Had a lot of heat on him.</p> <p>15 I mean, he's the man. Fedor is the</p> <p>16 greatest of all time. And when you can have a</p> <p>17 fighter like that come on to your roster, it's always</p> <p>18 a good day.</p> <p>19 Q. Did you believe that signing Fedor at</p> <p>20 Strikeforce would help Strikeforce sell</p> <p>21 pay-per-views?</p> <p>22 MS. GRIGSBY: Objection, foundation.</p> <p>23 THE WITNESS: I believed that he would help</p> <p>24 drive ratings on Showtime, I believed that he would</p> <p>25 put butts in seats. I would believe that he would</p>	<p style="text-align: right;">101</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. Is that something that you viewed as being</p> <p>3 important to Strikeforce?</p> <p>4 A. Yes.</p> <p>5 Q. And why is that?</p> <p>6 A. My goal was to build this company as big as</p> <p>7 we could, become a -- you know, a sizeable player in</p> <p>8 the mixed martial arts world.</p> <p>9 And I felt like we had a lot of pieces in</p> <p>10 place. We started -- we started recruiting top</p> <p>11 talent, that we were building from the ground up</p> <p>12 with, say, like Ty Woodley, Luke Rockhold, Daniel</p> <p>13 Cormier, a lot of the stars that are currently stars</p> <p>14 today for the UFC.</p> <p>15 We started building our free agent</p> <p>16 fighters. So we built the roster from the ground up</p> <p>17 and we bought some of the fighters from the top down.</p> <p>18 And I think that Fedor would have been the icing on</p> <p>19 the cake for us, you know, to just show the industry</p> <p>20 that, hey, these are real players, you can count on</p> <p>21 them, and they're going to be here for a long time.</p> <p>22 Q. This email in Exhibit 7 is dated July 4,</p> <p>23 2009, correct?</p> <p>24 A. Yes, that's correct.</p> <p>25 Q. Do you recall around that time frame, in</p>

<p style="text-align: right;">102</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 2009, did Strikeforce acquire fighters from any other</p> <p>3 promotion?</p> <p>4 A. Yes.</p> <p>5 Q. And what promotion was that?</p> <p>6 A. In 2009, we acquired Pro Elite.</p> <p>7 Q. And what was Pro Elite?</p> <p>8 A. Pro Elite was a struggling mixed martial</p> <p>9 arts fight company based out of Los Angeles. They --</p> <p>10 well, at this time, we already had acquired them.</p> <p>11 This is prior to this.</p> <p>12 Q. Right. So the email in Exhibit 7 is</p> <p>13 sometime later in 2009, Strikeforce had already</p> <p>14 acquired Pro Elite?</p> <p>15 A. That is correct. And my thought, honestly,</p> <p>16 was in October of '10 -- I'm sorry -- October of '08</p> <p>17 is when we acquired Pro Elite.</p> <p>18 So that's my belief. So we acquired</p> <p>19 Pro Elite, which had the CBS, Showtime contracts. It</p> <p>20 had Nick Diaz' contract, Robbie Lawler's contract, it</p> <p>21 had Gina Carano's contract. So we acquired a lot of</p> <p>22 these great fighters at the end of '08.</p> <p>23 Q. How did the acquisition -- well, let me</p> <p>24 withdraw that.</p> <p>25 Did Pro Elite include any other MMA brands</p>	<p style="text-align: right;">104</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 momentum, income was pretty much -- those two years</p> <p>3 was pretty much like a hockey stick. In a down</p> <p>4 economic time, we were not impacted by the economy</p> <p>5 because we were still packing the stadium, we had</p> <p>6 great ratings, and we were putting butts in seats.</p> <p>7 When I think about that time period for</p> <p>8 Strikeforce, I think that it was a great time for the</p> <p>9 company because we had just acquired all these great</p> <p>10 fighters, we already had great fighters. We were</p> <p>11 buying more fighters, we were starting to build more</p> <p>12 fighters. And we had a great TV deal, and you know,</p> <p>13 once you added Showtime and CBS, Strikeforce became</p> <p>14 really a regional brand to become a national brand.</p> <p>15 Q. And was Strikeforce becoming a stronger</p> <p>16 competitor to the UFC at that time?</p> <p>17 A. Yes.</p> <p>18 Q. And was Strikeforce competing with the UFC</p> <p>19 for top talent at that time, that is, fighters?</p> <p>20 A. The only fighter that I would think that we</p> <p>21 were both after that we really wanted was Fedor.</p> <p>22 Q. In terms of -- in terms of top fighters?</p> <p>23 A. Because we had just acquired all these</p> <p>24 great fighters, and we only had so many TV dates.</p> <p>25 So, you know, the house is pretty full, if you can</p>
<p style="text-align: right;">103</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 that Strikeforce acquired?</p> <p>3 A. No, because it was not a purchase of the</p> <p>4 entire company, it was just an asset purchase. So we</p> <p>5 plucked out certain things that we wanted and left a</p> <p>6 lot of things that we didn't want.</p> <p>7 Q. How did Strikeforce's acquisition of</p> <p>8 Pro Elite impact Strikeforce's business?</p> <p>9 A. When you have great fighters, great</p> <p>10 personalities, a great TV deal, then you can get</p> <p>11 great sponsorships, and you know, that's what helps</p> <p>12 you drive your business.</p> <p>13 Q. Is it your view, then, that without things</p> <p>14 such as great fighters, you can't do those other</p> <p>15 things, like attract great sponsors, et cetera?</p> <p>16 A. It makes it very difficult.</p> <p>17 Q. How would you -- how would you characterize</p> <p>18 the -- I guess Strikeforce around the -- as an MMA</p> <p>19 promotion at the time of the Pro Elite acquisition?</p> <p>20 How would you characterize its trajectory in the MMA</p> <p>21 marketplace?</p> <p>22 A. Clearly, No. 2 in the marketplace. I mean,</p> <p>23 UFC had a 20-year, you know, first in market</p> <p>24 advantage.</p> <p>25 But I think we were gaining ground, gaining</p>	<p style="text-align: right;">105</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 understand what I mean by that.</p> <p>3 So we were looking for that one fighter</p> <p>4 that could make a big impact, and we wanted to get</p> <p>5 Fedor on our roster.</p> <p>6 Q. At that time, how would you characterize</p> <p>7 Strikeforce's heavyweight division?</p> <p>8 A. The thought behind getting Fedor, honestly,</p> <p>9 was to put together I mean arguably the greatest</p> <p>10 heavyweight tournament ever in the history of MMA,</p> <p>11 especially North America.</p> <p>12 And we already had Alistair Overeem, we had</p> <p>13 Fabricio Werdum, we had Josh Barnett. We had Brett</p> <p>14 Rogers. We had Big Foot Silva, and we had Andrei</p> <p>15 Arlovski.</p> <p>16 And I wanted to put Fedor on a roster so I</p> <p>17 could put him in this tournament because I knew that</p> <p>18 this was a tournament that was going to be a</p> <p>19 significant difference maker in our sport.</p> <p>20 Q. How did you think that Strikeforce's</p> <p>21 heavyweight division compared to the UFC's</p> <p>22 heavyweight division in 2009?</p> <p>23 A. Yeah. In 2009 and '10, we had more top 10</p> <p>24 rated heavyweights than the UFC did. So arguably, we</p> <p>25 had a better heavyweight division than they did.</p>

<p style="text-align: right;">106</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. In your experience in many years of MMA</p> <p>3 promotion, what is your opinion of how important a</p> <p>4 heavyweight division is to an MMA promotion?</p> <p>5 A. I mean, I think that the light heavyweight</p> <p>6 division has been always a -- probably the strongest</p> <p>7 in MMA, and I think heavyweight, to me, would be just</p> <p>8 as important because everybody likes the</p> <p>9 heavyweights.</p> <p>10 Q. Does having a strong heavyweight division,</p> <p>11 in your experience, help an MMA promoter do things</p> <p>12 like, you know, attract fans, attract viewers or sell</p> <p>13 tickets?</p> <p>14 A. Put butts in seats? At that time in space,</p> <p>15 with Strikeforce, under that scenario, yes.</p> <p>16 Q. And so, at that time, in 2009, Strikeforce</p> <p>17 had the No. 1 heavyweight in the world?</p> <p>18 A. Shortly after this email, we signed Fedor.</p> <p>19 Q. So after July of 2009, when Strikeforce</p> <p>20 signed Fedor, Strikeforce had the No. 1 heavyweight</p> <p>21 in the world?</p> <p>22 A. Yes.</p> <p>23 Q. In MMA?</p> <p>24 A. Yes.</p> <p>25 Q. And how important did you think that that</p>	<p style="text-align: right;">108</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Mr. Coker is permitted to say.</p> <p>3 I have a copy of an employment agreement</p> <p>4 Mr. Coker signed that also has a confidentiality</p> <p>5 restriction. The language of that permits him to</p> <p>6 answer these questions in the context of the subpoena</p> <p>7 in this deposition.</p> <p>8 I do not know and Mr. Coker does not know</p> <p>9 what the sale document or the confidentiality and</p> <p>10 sale document provides and restricts. We understand</p> <p>11 that it's with Zuffa.</p> <p>12 So Mr. Coker is concerned, rightfully so,</p> <p>13 of violating that and does not want to answer</p> <p>14 questions that may -- that seek information covered</p> <p>15 by the scope of that confidentiality agreement.</p> <p>16 So I don't know if this is something that</p> <p>17 you guys have talked about leading up to today, but I</p> <p>18 think Mr. Coker will answer whatever questions he</p> <p>19 can. If he's not sure, absent some stipulation that,</p> <p>20 you know, Zuffa is waiving any confidentiality</p> <p>21 restrictions, he's going to be cautious and not</p> <p>22 disclose information that we think may be covered.</p> <p>23 MR. DELL'ANGELO: Okay. I appreciate that,</p> <p>24 Counsel, and I will say for counsel for Zuffa too, my</p> <p>25 questions are fair -- my intended questions are</p>
<p style="text-align: right;">107</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 was to Strikeforce as an MMA promoter?</p> <p>3 A. When people found out that we had signed</p> <p>4 Fedor and we had the Showtime TV deal and we had all</p> <p>5 these other heavyweights to fight Fedor and we had</p> <p>6 the CBS deal, it helped the brand tremendously in the</p> <p>7 perception of the general public and our fans, and I</p> <p>8 think we gained a lot of fans all over the world.</p> <p>9 It became -- you know, we already were a</p> <p>10 national player because we had Showtime, but now, I</p> <p>11 think Fedor helped us become an international TV</p> <p>12 property.</p> <p>13 Q. And as a result, was Strikeforce becoming</p> <p>14 an even stronger competitor in the MMA promotion</p> <p>15 business?</p> <p>16 A. Yes.</p> <p>17 Q. I think you testified earlier that in March</p> <p>18 of 2011, Strikeforce was sold to Zuffa?</p> <p>19 A. Yes.</p> <p>20 Q. Tell me about how that sale came to be.</p> <p>21 Who contacted whom?</p> <p>22 MR. KELLY: Let me just interject here.</p> <p>23 There is -- we believe that there is as</p> <p>24 part of the sale transaction a confidentiality</p> <p>25 provision that may provide some restriction on what</p>	<p style="text-align: right;">109</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 fairly high level along the lines of who contacted</p> <p>3 whom and how the sale came to be rather than about</p> <p>4 the details of the sale itself. I suppose if there</p> <p>5 are specific objections with respect to the</p> <p>6 confidentiality --</p> <p>7 MR. KELLY: And I raised the concern,</p> <p>8 context of that question because I just don't know</p> <p>9 how broad the scope of the confidentiality</p> <p>10 restriction is and if it covers, for example, the</p> <p>11 negotiations leading up to it, in theory, who</p> <p>12 contacted who could fall within that category.</p> <p>13 So you guys probably have the document and</p> <p>14 can advise the scope.</p> <p>15 MS. GRIGSBY: I do have the asset purchase</p> <p>16 agreement here, but we don't object based on</p> <p>17 confidentiality to discussing things like who</p> <p>18 contacted whom or I guess any other documents that</p> <p>19 were produced in the underlying litigation. So there</p> <p>20 are also Strikeforce documents that are produced as</p> <p>21 part of Zuffa's documents.</p> <p>22 MR. KELLY: Just so I'm clear, if the</p> <p>23 questions are about documents that were produced in</p> <p>24 this case and Mr. Coker is asked questions about</p> <p>25 those documents, Zuffa is agreeing on the record that</p>

<p style="text-align: right;">110</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 the confidentiality provisions won't restrict him</p> <p>3 from answering those questions?</p> <p>4 MS. GRIGSBY: Correct. I mean, this is</p> <p>5 subject to obviously a protective order as well, and</p> <p>6 we would designate some of these things as highly</p> <p>7 confidential, but we won't object.</p> <p>8 MR. KELLY: Yes. I just want to make sure</p> <p>9 that he personally isn't going to step into any</p> <p>10 trouble by answering questions.</p> <p>11 We'll take your representation on behalf of</p> <p>12 Zuffa, and if there is a question, I guess, that</p> <p>13 Zuffa draws the line, please interject because we</p> <p>14 don't know all the documents that have been produced</p> <p>15 in the underlying case or what information is out</p> <p>16 there.</p> <p>17 MR. DELL'ANGELO: I think there's a way to</p> <p>18 shortcut this to some extent.</p> <p>19 I'm going to mark as Exhibit 8 video</p> <p>20 No. 23.</p> <p>21 (Exhibit 8 was marked for</p> <p>22 identification but replaced below by</p> <p>23 a different video clip.)</p> <p>24 BY MR. DELL'ANGELO:</p> <p>25 Q. So video No. 23 is a video dated</p>	<p style="text-align: right;">112</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 like this. We're not going to do like, you know, the</p> <p>3 companies were, we have to do one every month.</p> <p>4 UNKNOWN SPEAKER: Umm.</p> <p>5 SCOTT COKER: Or every other month.</p> <p>6 We're going to do pay-per-view when the</p> <p>7 fights are big enough and we feel like we have an</p> <p>8 event that's big enough to do pay-per-view. So</p> <p>9 whether that's twice a year or three times a year or</p> <p>10 once a year, we'll do more that month.</p> <p>11 UNKNOWN SPEAKER: There's no set.</p> <p>12 MR. COKER: There's no set.</p> <p>13 UNKNOWN SPEAKER: Okay.</p> <p>14 MR. COKER: We'll be like the boxing model.</p> <p>15 UNKNOWN SPEAKER: Okay.</p> <p>16 MR. COKER: So when the fights are, you</p> <p>17 know -- you know, being built up to the point where</p> <p>18 we should be doing it, then we'll do it. But we're</p> <p>19 not going to be forced into, you know -- because</p> <p>20 otherwise, I think it's becomes irrelevant.</p> <p>21 UNKNOWN SPEAKER: Yeah.</p> <p>22 MR. COKER: It's like you're doing it just</p> <p>23 to be doing it.</p> <p>24 UNKNOWN SPEAKER: Right.</p> <p>25 Mr. COKER: And is it really a pay-per-view</p>
<p style="text-align: right;">111</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 September 6, 2014, also available on YouTube. It's</p> <p>3 an interview with Mr. Coker with Ariel Helwani.</p> <p>4 So why don't I play that, and since this is</p> <p>5 publicly available, we can use this as a basis.</p> <p>6 A. Perfect. Okay.</p> <p>7 (Video clip played.)</p> <p>8 MR. COKER: We're going to stay with that,</p> <p>9 and that's work, and to me, it's like, look --</p> <p>10 THE REPORTER: Wait.</p> <p>11 (Video stopped.)</p> <p>12 MR. KELLY: Can we start over.</p> <p>13 MR. DELL'ANGELO: We're now playing</p> <p>14 Exhibit 8, which is an excerpt of a September 6, 2014</p> <p>15 interview of the witness, Mr. Coker, by Ariel</p> <p>16 Helwani.</p> <p>17 (Video clip played.)</p> <p>18 SCOTT COKER: We're going to stay with</p> <p>19 that, and that's work, and to me, it's like, look, if</p> <p>20 Chael Sonnen wins and Fedor wins, hey, he's already</p> <p>21 told me he wants to fight Fedor. So maybe that fight</p> <p>22 goes together. That's a pay-per-view worthy fight</p> <p>23 card.</p> <p>24 UNKNOWN SPEAKER: Yeah.</p> <p>25 SCOTT COKER: I mean fight. So to me, it's</p>	<p style="text-align: right;">113</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 worthy card, you know. That's really -- I don't want</p> <p>3 to be in that situation. I want to be in a situation</p> <p>4 where this is like boxing. When the fight is built</p> <p>5 up big enough, then we'll go for it.</p> <p>6 UNKNOWN SPEAKER: You look at it like</p> <p>7 Triple G and Danny --</p> <p>8 (Video stopped.)</p> <p>9 MR. DELL'ANGELO: I think the wrong video</p> <p>10 got played. I'm going to withdraw. Could we play</p> <p>11 15.</p> <p>12 This is a September 1, 2016 interview from</p> <p>13 The Fighter and The Kid. It's a continuation of the</p> <p>14 one that we marked earlier today.</p> <p>15 THE REPORTER: Is this Exhibit 8 now?</p> <p>16 MR. DELL'ANGELO: I'd like to make it</p> <p>17 Exhibit 8 if that's okay with everybody.</p> <p>18 MR. KELLY: Fine with us.</p> <p>19 MS. GRIGSBY: Fine with me.</p> <p>20 (Exhibit 8 was marked for</p> <p>21 identification by the reporter.)</p> <p>22 (Video clip played.)</p> <p>23 MR. COKER: You know what, it was a special</p> <p>24 moment in time, and it was the end of Pro Elite era,</p> <p>25 so they signed all these great fighters, and we</p>

<p style="text-align: right;">114</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 bought Pro Elite. And it's kind of like a</p> <p>3 double-edged sword because when we brought Pro Elite,</p> <p>4 I had to take on a financial partner to make that</p> <p>5 acquisition. So I brought in -- before I owned a</p> <p>6 hundred percent of it, right? So we're moving along</p> <p>7 and we're doing great gains at the HP Pavilion,</p> <p>8 signing big fighters. And then, and then, this</p> <p>9 opportunity comes along and I said, okay, well, to do</p> <p>10 this deal, I need to go bring in a partner. So my</p> <p>11 arena that I was doing fights at, they are owned by</p> <p>12 the San Jose Sharks. So they had been approaching me</p> <p>13 saying, hey, when you want to do a deal, we would</p> <p>14 like to invest with you. And so, I said okay, now is</p> <p>15 the time. So they put in a bunch of money, they got</p> <p>16 a percentage of the company. It's actually an equal</p> <p>17 percentage, right? So we went and we brought</p> <p>18 Pro Elite, we got Gina Carano, and we got, you know,</p> <p>19 Nick Diaz. We got, you know --</p> <p>20 Q. Miesha --</p> <p>21 A. -- no, Miesha was somebody we found in a</p> <p>22 tournament. We had a tournament.</p> <p>23 But anyway, so we got about ten top, top,</p> <p>24 talented athletes, world class athletes. And then we</p> <p>25 integrated them with our roster, which was Cung,</p>	<p style="text-align: right;">116</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 mention that you, Strikeforce had been approached by</p> <p>3 the UFC.</p> <p>4 Do you recall that?</p> <p>5 A. We got a call from Dana White, in I believe</p> <p>6 it was October of '10. And Dana said that Lorenzo</p> <p>7 wants to buy Strikeforce, you know, are you</p> <p>8 interested?</p> <p>9 And I'll never forget it because I was</p> <p>10 really at Dave and Buster's having dinner going,</p> <p>11 well, why does he want to buy Strikeforce? And I</p> <p>12 said, well, let me get back to you, Dana. I'm going</p> <p>13 to talk to my partners, and then, I'll circle back.</p> <p>14 Q. Was that the first time that Mr. White or</p> <p>15 somebody from the UFC had contacted Strikeforce about</p> <p>16 purchasing Strikeforce?</p> <p>17 A. I believe so, yes.</p> <p>18 Q. And did Mr. White or somebody from the UFC</p> <p>19 contact Strikeforce more than once about purchasing</p> <p>20 Strikeforce?</p> <p>21 A. After this date --</p> <p>22 Q. Yes.</p> <p>23 A. -- the initial date?</p> <p>24 What happened was Dana contacted me, I</p> <p>25 contacted my partners.</p>
<p style="text-align: right;">115</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Frank, and Josh Thompson, Gilbert Melendez, and then,</p> <p>3 we started taking off.</p> <p>4 And so, that was -- that way, so because</p> <p>5 with that deal, we got the CBS contract and the</p> <p>6 Showtime contract because that's what they had, they</p> <p>7 had delivered or they had already acquired those. So</p> <p>8 we had instantly a Showtime deal. We went from doing</p> <p>9 four fights a year to 16 fights a year, had to ramp</p> <p>10 up. It was a great time of growth for the company,</p> <p>11 and then -- and then, you know, that was in 2009 --</p> <p>12 2008. And 2010, you know, the UFC knocks on the door</p> <p>13 and says, "We'd like to acquire Strikeforce."</p> <p>14 (End of video clip.)</p> <p>15 BY MR. DELL'ANGELO:</p> <p>16 Q. So Mr. Coker, you've had an opportunity to</p> <p>17 see the video that we've marked as Exhibit 8.</p> <p>18 Was that you in the video that was just</p> <p>19 played?</p> <p>20 A. Yes.</p> <p>21 Q. Do you have any reason to believe that that</p> <p>22 wasn't an accurate depiction of you and what you said</p> <p>23 in or around September 1, 2016?</p> <p>24 A. That's correct.</p> <p>25 Q. So at the end of the video there, you</p>	<p style="text-align: right;">117</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 And then, I think somebody from Ari's</p> <p>3 company knew somebody from our company, and then they</p> <p>4 contacted them. So my partners and I said, well,</p> <p>5 let's just go listen to them and hear what they have</p> <p>6 to say. That's all.</p> <p>7 Q. And who are the partners that you're</p> <p>8 referring to.</p> <p>9 A. On my side?</p> <p>10 Q. Yes.</p> <p>11 A. It was the ownership group of Silicon</p> <p>12 Valley tech investors that made up Silicon Valley</p> <p>13 Sports Entertainment. One was a gentleman by the</p> <p>14 name of Stratton Scavos, and one was Kevin Compton,</p> <p>15 and was Hasso -- I think it's Hasso Platinum?</p> <p>16 Platinum.</p> <p>17 But the ownership group was a bunch of high</p> <p>18 tech, very successful investment group.</p> <p>19 Q. And so, did you and representatives of</p> <p>20 Strikeforce or its investor group then go and meet</p> <p>21 with representatives of UFC about UFC's potential</p> <p>22 acquisition of Strikeforce?</p> <p>23 A. Yes.</p> <p>24 Q. And when was that?</p> <p>25 A. That was, I believe it was two days before</p>

<p style="text-align: right;">118</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Thanksgiving in '10.</p> <p>3 Q. So November 2010 sometime?</p> <p>4 A. Yes.</p> <p>5 Q. And where did you -- where did you meet</p> <p>6 with UFC --</p> <p>7 A. We met with their -- we went with the UFC</p> <p>8 at the WME offices here in Beverly Hills.</p> <p>9 Q. With whom from the UFC did you meet?</p> <p>10 A. Lorenzo Fertitta was there. Ari Emanuel</p> <p>11 was there.</p> <p>12 Q. Anyone else?</p> <p>13 A. And I believe there was a couple lawyers,</p> <p>14 they brought in a couple lawyers from their side, and</p> <p>15 I don't remember their names.</p> <p>16 Q. And did Mr. Fertitta speak at the meeting?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And what did he say?</p> <p>19 A. He said, "I guess I should open it up</p> <p>20 because I'm the one that called the meeting."</p> <p>21 And he said, "I think Strikeforce is</p> <p>22 building a great brand, but we feel there should only</p> <p>23 be one brand, so we would like to buy your company."</p> <p>24 Q. Did he explain why he felt that there</p> <p>25 should only be one brand?</p>	<p style="text-align: right;">120</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. Right.</p> <p>3 A. So you know, I just, you know, was not that</p> <p>4 interested anymore.</p> <p>5 Q. What was your view at the time, if any --</p> <p>6 well, let me withdraw that.</p> <p>7 Did you have a view at the time of what</p> <p>8 impact shutting Strikeforce would have on the MMA</p> <p>9 industry if the UFC acquired it and shut it down?</p> <p>10 A. I mean, I knew that there's only one player</p> <p>11 left, it's not going to be a healthy industry.</p> <p>12 Somebody is going to control the marketplace,</p> <p>13 control, you know, the fighter purses, which really</p> <p>14 is the number one key item as far as cost in the</p> <p>15 company.</p> <p>16 You know, but at that time, at that moment,</p> <p>17 you know, I was like, you know, I have no interest in</p> <p>18 selling Strikeforce.</p> <p>19 Q. And at that time, did you need to sell</p> <p>20 Strikeforce?</p> <p>21 A. No.</p> <p>22 Q. Did you want to sell Strikeforce?</p> <p>23 A. No.</p> <p>24 Q. I think you testified earlier that, at this</p> <p>25 time, Strikeforce was doing pretty well, right?</p>
<p style="text-align: right;">119</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 A. No.</p> <p>3 Q. What did you understand him to mean?</p> <p>4 A. That he wanted to buy Strikeforce to get</p> <p>5 our fighters and make Strikeforce go away.</p> <p>6 Q. Did you have a view as to why UFC or</p> <p>7 Mr. Fertitta might want Strikeforce to go away in</p> <p>8 November of 2010?</p> <p>9 A. I asked him. I said, "Lorenzo, why do you</p> <p>10 want to buy Strikeforce? You already have Pride, you</p> <p>11 already have WEC."</p> <p>12 I think they had bought WEC and they had</p> <p>13 bought three or four companies, you know.</p> <p>14 I said, "What would you do with it?"</p> <p>15 And he said, "Well, we would -- we would</p> <p>16 close it down, and we would take all the fighters and</p> <p>17 bring them to the UFC."</p> <p>18 Q. And did he tell you anything else about</p> <p>19 UFC's plans if it acquired Strikeforce?</p> <p>20 A. No. I wasn't that interested in hearing</p> <p>21 any more after that.</p> <p>22 Q. Why is that?</p> <p>23 A. Well, you know, like closing Strikeforce</p> <p>24 down had -- you know, that just didn't fit in my</p> <p>25 vocabulary.</p>	<p style="text-align: right;">121</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 A. Yes.</p> <p>3 Q. And did you view Strikeforce as being</p> <p>4 competitive with UFC at the time?</p> <p>5 A. UFC was still No. 1 in the marketplace, but</p> <p>6 we had some tremendous growth and gain, and we were</p> <p>7 getting momentum.</p> <p>8 Q. And did -- let me play for you -- well, in</p> <p>9 terms of the -- withdraw that.</p> <p>10 In terms of the talent base that</p> <p>11 Strikeforce had around the time November 2010 when</p> <p>12 you were discussing a potential acquisition by the</p> <p>13 UFC, did you view the Strikeforce's talent base as</p> <p>14 being competitive with the UFC's?</p> <p>15 MS. GRIGSBY: Objection to form.</p> <p>16 THE WITNESS: I believe that the phone</p> <p>17 started ringing from Dana because we had signed Fedor</p> <p>18 and we announced the heavyweight tournament.</p> <p>19 It was clear that although we were a very</p> <p>20 small company, much smaller than the UFC, but we were</p> <p>21 in the same business, that we had a better</p> <p>22 heavyweight division than they did, and I think that</p> <p>23 that was one of the considerations on their part.</p> <p>24 BY MR. DELL'ANGELO:</p> <p>25 Q. And so, what was the result of -- withdraw</p>

<p style="text-align: right;">122</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 that.</p> <p>3 What was the outcome of the meeting that</p> <p>4 you had with Lorenzo Fertitta, Ari Emanuel, and the</p> <p>5 lawyers who were present in late November 2010</p> <p>6 regarding the UFC's possible acquisition of</p> <p>7 Strikeforce?</p> <p>8 A. The outcome of the meeting was they threw</p> <p>9 out a number which we felt was ridiculous, and they</p> <p>10 left the room and said: Why don't you guys think</p> <p>11 about it. And CAA represented us, Brian Weinstein,</p> <p>12 Craig Jacobson was there, my lawyer, Stratton</p> <p>13 Sclavos, was there.</p> <p>14 We were there just to hear them talk, you</p> <p>15 know, hear what they had to say. After they threw an</p> <p>16 offer and said think about it, we just got up and</p> <p>17 left and went home.</p> <p>18 Q. And what number did the UFC put out there?</p> <p>19 A. I can't recall. It was like a single-digit</p> <p>20 number.</p> <p>21 Q. So was it in the order of millions of</p> <p>22 dollars?</p> <p>23 A. Oh, yeah, millions, yeah.</p> <p>24 Q. So it was a single-digit million?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">124</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 A. No.</p> <p>3 Q. Do you recall whether or not anyone on</p> <p>4 behalf of Strikeforce or the investors whom you've</p> <p>5 identified, do you recall whether or not any of them</p> <p>6 spoke to Mr. White about the UFC's possible</p> <p>7 acquisition of Strikeforce?</p> <p>8 MS. GRIGSBY: Objection, foundation.</p> <p>9 THE WITNESS: Yeah, I can only speculate.</p> <p>10 (Exhibit 9 was marked for</p> <p>11 identification by the reporter.)</p> <p>12 BY MR. DELL'ANGELO:</p> <p>13 Q. Let me show you what I've marked as</p> <p>14 Exhibit 9 to the deposition.</p> <p>15 For the record, Exhibit 9 is a one-page</p> <p>16 email, ZUF-00447778.</p> <p>17 It's a one-page email from Stratton Sclavos</p> <p>18 to Craig Jacobson, Brian Weinstein, and copied to</p> <p>19 Charlie Faas and Scott Clifford, subject: Call with</p> <p>20 Lorenzo.</p> <p>21 Mr. Coker, would you take a look at</p> <p>22 Exhibit 8, please, and tell me if you recognize that</p> <p>23 document?</p> <p>24 A. Okay, yeah, I remember this.</p> <p>25 Q. What do you remember?</p>
<p style="text-align: right;">123</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. Less than 10 million?</p> <p>3 A. Yes.</p> <p>4 Q. And then, did discussions between</p> <p>5 Strikeforce and the UFC resume at some point</p> <p>6 thereafter regarding the possible sale of Strikeforce</p> <p>7 to the UFC?</p> <p>8 A. Yes.</p> <p>9 Q. And do you recall approximately when that</p> <p>10 was?</p> <p>11 A. Stratton and Lorenzo kept talking.</p> <p>12 And then, Lorenzo, you know, he and -- you</p> <p>13 know, like they kept talking about the deal, what</p> <p>14 kind of deal.</p> <p>15 I had told my partner: Listen, I'm not</p> <p>16 interested, you know.</p> <p>17 And that went on from like November,</p> <p>18 December. I would say at some point, it stopped.</p> <p>19 And I'd say after January 1st, it picked back up.</p> <p>20 Q. And was Mr. White involved in any of the</p> <p>21 conversations, to the best of your knowledge?</p> <p>22 A. No.</p> <p>23 Q. Just so we're clear, you didn't speak to</p> <p>24 Mr. White about the UFC's acquisition or possible</p> <p>25 acquisition of Strikeforce?</p>	<p style="text-align: right;">125</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 A. Okay. So this is what I remember now.</p> <p>3 The -- so I wasn't talking to the UFC at all, and</p> <p>4 Stratton was talking to the UFC.</p> <p>5 And then, he said that Lorenzo was on a</p> <p>6 call with Stratton, and Stratton and Lorenzo were</p> <p>7 really the ones driving this deal, right?</p> <p>8 So they -- they were having a conversation,</p> <p>9 and he said -- Dana White jumped on the phone call.</p> <p>10 That's what this is.</p> <p>11 And he said -- and I go, "How was it?" And</p> <p>12 he said, "Oh, you know, he was basically saying that</p> <p>13 you guys aren't worth any money, and you're lucky,</p> <p>14 you should take this deal." Typical, you know,</p> <p>15 conversation.</p> <p>16 So that's what this is about. This is</p> <p>17 about that conversation.</p> <p>18 And then, he sent me this email, and then,</p> <p>19 he called me, Stratton called me, and said, hey, I</p> <p>20 just got off the phone with Lorenzo, and you know, we</p> <p>21 told him that this was the dollar amount that we</p> <p>22 would accept.</p> <p>23 And they came back and, you know, said that</p> <p>24 they thought 28 million was a number.</p> <p>25 And I just said, okay, well, just let me</p>

<p style="text-align: right;">130</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 A. No.</p> <p>3 Q. Did you believe that it was necessary to</p> <p>4 make derogatory comments about Dana White or other</p> <p>5 executives at the UFC in order to have a successful</p> <p>6 promotion at Strikeforce?</p> <p>7 A. No.</p> <p>8 Q. Did you believe that you needed to engage</p> <p>9 in the other types of conduct that the UFC engaged</p> <p>10 in, such as with respect to venues or sponsors at</p> <p>11 Affliction and Tapout that you testified about in</p> <p>12 order to have a successful MMA promotion at</p> <p>13 Strikeforce?</p> <p>14 MS. GRIGSBY: Objection to form, compound.</p> <p>15 THE WITNESS: No, it's just not my style of</p> <p>16 doing business.</p> <p>17 BY MR. DELL'ANGELO:</p> <p>18 Q. Notwithstanding whether or not it's your</p> <p>19 style, which I appreciate, did you think it was</p> <p>20 necessary for you to engage in that sort of behavior</p> <p>21 in order to have a successful promotion at</p> <p>22 Strikeforce?</p> <p>23 A. No.</p> <p>24 MS. GRIGSBY: Objection to form.</p> <p>25</p>	<p style="text-align: right;">132</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. Okay. Are there other fighters that you</p> <p>3 can think of that the UFC acquired from Strikeforce</p> <p>4 that went on to be contenders for a championship in</p> <p>5 the UFC?</p> <p>6 A. With Gregor Mushashi, Jacare Souza.</p> <p>7 The Cuban fighter, what's his name? I</p> <p>8 forgot his name. But he's pretty prominent right</p> <p>9 now.</p> <p>10 Q. How about Alistair Overeem?</p> <p>11 A. Yes. Alistair Overeem, Fabricio Werdum,</p> <p>12 Josh Barnett, Big Foot Silva.</p> <p>13 Q. That's Antonio Silva?</p> <p>14 A. I believe so. They're all named Silvas. I</p> <p>15 get confused.</p> <p>16 Q. How about Gilbert Melendez?</p> <p>17 A. Yes. Gilbert Melendez. Josh Thompson.</p> <p>18 Q. Did Gilbert Melendez go on to become a</p> <p>19 championship contender in the UFC?</p> <p>20 A. Yes.</p> <p>21 Q. He was acquired by UFC from Strikeforce?</p> <p>22 A. Yes.</p> <p>23 Cung Le.</p> <p>24 Q. And how about Dan Henderson?</p> <p>25 A. Yes, Dana Henderson got acquired.</p>
<p style="text-align: right;">131</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 BY MR. DELL'ANGELO:</p> <p>3 Q. So did there come a time when -- I think</p> <p>4 you've already testified, there came a time in March</p> <p>5 of 2011, correct, when Strikeforce acquired UFC --</p> <p>6 I'm sorry, withdraw that.</p> <p>7 I think you testified earlier that in March</p> <p>8 of 2011, Strikeforce was acquired by the UFC,</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. Do you recall -- how would you characterize</p> <p>12 the quality of fighters that the UFC acquired from</p> <p>13 Strikeforce?</p> <p>14 A. Substantial.</p> <p>15 Q. And do you recall -- or, withdraw that.</p> <p>16 Do you know if some of the fighters that</p> <p>17 the UFC acquired from Strikeforce went on to become</p> <p>18 champions at the UFC?</p> <p>19 A. Yes.</p> <p>20 Q. And who are you thinking of?</p> <p>21 A. Luke Rockhold, Ty Woodley.</p> <p>22 Q. Any others that you can think of?</p> <p>23 A. Robbie Lawler, Ronda Rousey, Nick Diaz.</p> <p>24 Daniel Cormier. Miesha Tate. Amanda Nunez.</p> <p>25 I think that's a pretty good list.</p>	<p style="text-align: right;">133</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. And he went on to be a championship</p> <p>3 contender in the UFC?</p> <p>4 A. Yes. In fact, I think his last fight was</p> <p>5 against Michael Bisping and he lost.</p> <p>6 Q. And who was Michael Bisping at the time of</p> <p>7 that fight?</p> <p>8 A. The current middleweight champion.</p> <p>9 Q. At the UFC?</p> <p>10 A. At the UFC.</p> <p>11 Q. And how about Tim Kennedy?</p> <p>12 A. Yes, Tim Kennedy, another contender.</p> <p>13 Q. And how about Yoel Romero?</p> <p>14 A. Yoel Romero, that's the Cuban gentleman I</p> <p>15 was referring to.</p> <p>16 Q. It's your understanding he went on to be a</p> <p>17 contender for the championship of UFC?</p> <p>18 A. Yes.</p> <p>19 Q. And was acquired by the UFC from</p> <p>20 Strikeforce?</p> <p>21 A. Yes.</p> <p>22 Q. And how about Paul Daley?</p> <p>23 A. Yes. I believe his contract with assigned,</p> <p>24 but it was a very short relationship. I don't think</p> <p>25 he stayed there long.</p>

<p style="text-align: right;">134</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. How would you characterize him as a fighter</p> <p>3 in terms of quality?</p> <p>4 A. Oh, top fighter.</p> <p>5 Q. How about Lorenzo Larkin?</p> <p>6 A. Yes.</p> <p>7 Q. Also acquired --</p> <p>8 A. Yes.</p> <p>9 Q. -- by the UFC from Strikeforce?</p> <p>10 A. Yes.</p> <p>11 Q. How about Josh Thompson?</p> <p>12 A. Correct.</p> <p>13 Q. Also acquired by the UFC from Strikeforce?</p> <p>14 A. Yes.</p> <p>15 Q. And that list of fighters that we covered,</p> <p>16 Dan Cormier, Dan Cormier, Fabricio Werdum, Alistair</p> <p>17 Overeem, Big Foot Silva, Josh Barnett, Gerard</p> <p>18 Mousasi, Rafael Cavalcante, Dan Henderson, Jake</p> <p>19 Shields, Ronaldo Souza, Robbie Lawler, Tim Kennedy,</p> <p>20 Luke Rockhold, Yoel Romero, Tyrone Woodley, Nick</p> <p>21 Diaz, Paul Daley, Lorenz Larkin, Gilbert Melendez,</p> <p>22 Josh Thompson, Ronda Rousey, Miesha Tate, how would</p> <p>23 you characterize them in terms of quality of fighters</p> <p>24 in MMA promotions?</p> <p>25 A. I mean, a lot of those fighters are the</p>	<p style="text-align: right;">136</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. And what did the fighters -- sorry. Anyone</p> <p>3 else?</p> <p>4 A. Those are the -- those are the two that</p> <p>5 I...</p> <p>6 Q. Okay. And what did fighters tell you about</p> <p>7 the impact of the sale of Strikeforce to the UFC?</p> <p>8 A. On one hand, they were happy because, you</p> <p>9 know, we had sold the company.</p> <p>10 On the other hand, they were disappointed</p> <p>11 because, you know, now they have to -- you know, they</p> <p>12 came to work for Strikeforce not to go work for the</p> <p>13 UFC. And so now, they're assigned to the UFC. So</p> <p>14 there was some of that dialogue that went back and</p> <p>15 forth between us.</p> <p>16 Q. And did they have any -- after the sale --</p> <p>17 immediately after the sale of Strikeforce to the UFC,</p> <p>18 did those fighters have opportunities to fight in,</p> <p>19 you know, promotions with people sort of quality and</p> <p>20 stature to the UFC?</p> <p>21 MS. GRIGSBY: Objection to form,</p> <p>22 speculation.</p> <p>23 THE WITNESS: Can you repeat the question</p> <p>24 one more time.</p> <p>25</p>
<p style="text-align: right;">135</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 stars of our sport today.</p> <p>3 Q. So it's fair to say that the UFC acquired</p> <p>4 some significant number of very high quality</p> <p>5 fighters, many of whom went on to be champions or</p> <p>6 championship contenders in the UFC?</p> <p>7 A. Yes.</p> <p>8 Q. And UFC acquired them from Strikeforce?</p> <p>9 A. Yes.</p> <p>10 Q. After Strikeforce sold its promotion to the</p> <p>11 UFC, did you receive feedback from members of the</p> <p>12 industry regarding the impact of the sale on the MMA</p> <p>13 industry?</p> <p>14 A. Yeah. A lot of people were disappointed.</p> <p>15 Q. And why were they disappointed?</p> <p>16 A. Because you know, I had managers call me</p> <p>17 and say: Now our purses are going to go down. Now</p> <p>18 there's only one buyer, and it's not going to be good</p> <p>19 for MMA as an industry.</p> <p>20 Q. And did anyone else other than managers</p> <p>21 contact you to tell you about what they had thought</p> <p>22 about the impact of the sale of Strikeforce to the</p> <p>23 UFC on the MMA industry?</p> <p>24 A. I mean, I had a lot of fighters reach out.</p> <p>25 I had some media reach out.</p>	<p style="text-align: right;">137</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 BY MR. DELL'ANGELO:</p> <p>3 Q. Sure. I'll withdraw the question.</p> <p>4 And how would you describe the health of</p> <p>5 the MMA promotion industry after the sale of</p> <p>6 Strikeforce to the UFC?</p> <p>7 MS. GRIGSBY: Objection, calls for expert</p> <p>8 testimony.</p> <p>9 MR. KELLY: Join.</p> <p>10 MR. DELL'ANGELO: Let me withdraw that.</p> <p>11 BY MR. DELL'ANGELO:</p> <p>12 Q. How would you characterize the MMA industry</p> <p>13 immediately -- well, withdraw.</p> <p>14 How would you characterize the state of the</p> <p>15 MMA industry in the 12 months after the sale of</p> <p>16 Strikeforce to the UFC?</p> <p>17 MS. GRIGSBY: Same objection.</p> <p>18 THE WITNESS: I did have managers that</p> <p>19 called me. Some of these are friends of mine. And</p> <p>20 said, you know, the offers are about 20 percent less</p> <p>21 than when you guys were here.</p> <p>22 And I apologized and, you know, let them</p> <p>23 know my thoughts.</p> <p>24 But some people were not happy.</p> <p>25</p>

<p style="text-align: right;">138</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 BY MR. DELL'ANGELO:</p> <p>3 Q. To be clear, why were they not happy?</p> <p>4 A. Because the sale of Strikeforce impacted</p> <p>5 their fighters' income.</p> <p>6 Q. In a negative way or a positive way?</p> <p>7 A. In a negative way.</p> <p>8 Q. I'd like to play another short video clip</p> <p>9 for you.</p> <p>10 A. Okay.</p> <p>11 Q. This is taken from a June 18th, 2015</p> <p>12 interview with MMA Fighting on ESPN, also available</p> <p>13 on YouTube. I believe it was done in St. Louis,</p> <p>14 Missouri.</p> <p>15 I'm going to mark this as Exhibit 10.</p> <p>16 (Exhibit 10 was marked for</p> <p>17 identification by the reporter.)</p> <p>18 MR. DELL'ANGELO: Would the videographer</p> <p>19 please play video No. 4.</p> <p>20 (Video clip played.)</p> <p>21 UNKNOWN SPEAKER: Sure, but you would agree</p> <p>22 that things are different since the peak era of</p> <p>23 Strikeforce?</p> <p>24 MR. COKER: Well, I was just --</p> <p>25 UNKNOWN SPEAKER: It's just got to be --</p>	<p style="text-align: right;">140</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 you know, like it would unify some of these fighters</p> <p>3 into having, you know, who is really king of the</p> <p>4 hill, so to speak, or who is the best fighter.</p> <p>5 But I think that we had built our own</p> <p>6 audience, and Pride had built their own audience.</p> <p>7 All these companies had built their own audiences.</p> <p>8 And for some reason, it just didn't</p> <p>9 resonate, and I think that the industry at that time</p> <p>10 just kind of had a lull in it, you know, and I think</p> <p>11 people were, you know, disappointed that we had sold</p> <p>12 and disappointed that Pride had sold because they</p> <p>13 were fans of Pride, they were fans of Strikeforce.</p> <p>14 And maybe not necessarily a fan of the UFC.</p> <p>15 You could obviously be a fan of all three.</p> <p>16 Like myself, I would watch all three.</p> <p>17 But we had developed our own fan base to</p> <p>18 the point where they were fans of our own company.</p> <p>19 And so, when we went to -- when these</p> <p>20 fighters went over to the UFC, I don't think some of</p> <p>21 our fans went with them.</p> <p>22 And so, I think there was a lull, it was</p> <p>23 kind of -- and I think it took about a year to get</p> <p>24 out of that funk, you know, but I think the mixed</p> <p>25 martial arts industry was in a little bit of a funk</p>
<p style="text-align: right;">139</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 it's a lot harder to --</p> <p>3 MR. COKER: I will tell you this. After I</p> <p>4 sold Strikeforce, I think the industry went like</p> <p>5 this.</p> <p>6 (End of video clip.)</p> <p>7 BY MR. DELL'ANGELO:</p> <p>8 Q. So Mr. Coker, is that you depicted in the</p> <p>9 video?</p> <p>10 A. Yes.</p> <p>11 Q. And is that an accurate depiction of a</p> <p>12 comment that you made on or about June 18, 2015 to</p> <p>13 MMA fighting?</p> <p>14 A. Yes.</p> <p>15 Q. Tell me if I'm characterizing this</p> <p>16 incorrectly, but I think you're indicating the hand</p> <p>17 motion you made was in a downward direction; is that</p> <p>18 correct?</p> <p>19 A. Correct.</p> <p>20 Q. What did you mean by what you were saying</p> <p>21 as depicted in the video of Exhibit 10?</p> <p>22 A. To me, it was a surprise because, you know,</p> <p>23 one of the things that I had thought would happen in</p> <p>24 selling the company was like our champions would</p> <p>25 eventually fight their champions, and it would be,</p>	<p style="text-align: right;">141</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 at that time, in 2012.</p> <p>3 Q. When you sold -- well, you and your</p> <p>4 partners sold Strikeforce to the UFC in March of</p> <p>5 2013, did you need to sell Strikeforce?</p> <p>6 A. No.</p> <p>7 Q. Were there economic considerations with</p> <p>8 respect to the profitability of Strikeforce that</p> <p>9 necessitated a sale for some reason?</p> <p>10 A. No.</p> <p>11 Q. So why did you make the decision to sell</p> <p>12 Strikeforce?</p> <p>13 A. Well -- and you'll see this in the</p> <p>14 interview, and they asked me: If you had to do</p> <p>15 things all over again, what would you do different?</p> <p>16 And I said, well, I would have found a different</p> <p>17 partner, somebody that was in it for the long term</p> <p>18 and all the right reasons.</p> <p>19 And my partners are high-tech investors</p> <p>20 that weren't necessarily emotionally attached to</p> <p>21 Strikeforce. They saw a quick return from '08, when</p> <p>22 they invested, to 2010 or '11. They saw a quick</p> <p>23 return, and they didn't understand why I didn't get</p> <p>24 it. You know, they were like: What is wrong with</p> <p>25 you? And I'm like: No, I didn't want to sell it.</p>

<p style="text-align: right;">162</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 preacquisition, did that cease once UFC had completed</p> <p>3 the acquisition of Strikeforce?</p> <p>4 MS. GRIGSBY: Objection to form.</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MR. DELL'ANGELO:</p> <p>7 Q. So for example, after the UFC acquired</p> <p>8 Strikeforce, Mr. White stopped calling Strikeforce</p> <p>9 Strikeforce?</p> <p>10 A. Yes, that's correct.</p> <p>11 Q. Okay. And after the UFC acquired</p> <p>12 Strikeforce, to the best of your knowledge, did</p> <p>13 Mr. White stop making personal attacks with respect</p> <p>14 to you?</p> <p>15 A. To my knowledge.</p> <p>16 Q. I apologize if I asked this before. I just</p> <p>17 wanted to be clear about this point.</p> <p>18 Were you involved in the decision to cease</p> <p>19 operations of Strikeforce after the acquisition by</p> <p>20 UFC?</p> <p>21 A. No.</p> <p>22 Q. Did anyone at the UFC discuss with you some</p> <p>23 of the changes that you've testified about after the</p> <p>24 UFC's acquisition of Strikeforce, such as with</p> <p>25 respect to fighters and sponsorship tax, those sorts</p>	<p style="text-align: right;">164</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 March of 2014?</p> <p>3 MR. KELLY: Objection, vague and ambiguous.</p> <p>4 MR. DELL'ANGELO: Fair. I'll withdraw the</p> <p>5 question.</p> <p>6 BY MR. DELL'ANGELO:</p> <p>7 Q. After March of 2014, were you employed?</p> <p>8 A. No.</p> <p>9 Q. Did you become involved in any other MMA</p> <p>10 promotion?</p> <p>11 A. In June of '14, I did.</p> <p>12 Q. And in June of 2014, what MMA promotion did</p> <p>13 you become involved in?</p> <p>14 A. Bellator MMA.</p> <p>15 Q. And I think you mentioned a little earlier</p> <p>16 that your agreement with the UFC after the</p> <p>17 acquisition of Strikeforce was essentially a</p> <p>18 noncompete; is that right?</p> <p>19 A. It was an employment agreement, but as we</p> <p>20 were negotiating the deal with my partners, they</p> <p>21 approached me, and they said look, you know, UFC is</p> <p>22 not going to just let you open up another company in</p> <p>23 two months.</p> <p>24 Q. Sure.</p> <p>25 A. So there's going to be an employment</p>
<p style="text-align: right;">163</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 of things?</p> <p>3 A. Can you repeat that one more time.</p> <p>4 Q. Sure. So I think you testified a little</p> <p>5 earlier that there were some changes at Strikeforce</p> <p>6 after it was acquired by the UFC, some of those</p> <p>7 things including like moving fighters from</p> <p>8 Strikeforce to the UFC and imposition of the</p> <p>9 sponsorship tax to Strikeforce fighters.</p> <p>10 Did anybody at the UFC talk to you about</p> <p>11 those decisions?</p> <p>12 A. No. My role, really, was almost like an</p> <p>13 on-call consultant, and I had no decision-making</p> <p>14 ability at my time at the UFC.</p> <p>15 Q. All right. Did there come a time -- did</p> <p>16 there come a time when you ceased to be involved with</p> <p>17 Strikeforce and the UFC altogether?</p> <p>18 A. Yes.</p> <p>19 Q. When was that?</p> <p>20 A. March of '14.</p> <p>21 Q. Okay. And why in March of '14 did you come</p> <p>22 to no longer be involved with Strikeforce or the UFC?</p> <p>23 A. That is when my three-year deal with the</p> <p>24 UFC ran out.</p> <p>25 Q. And what, if anything, did you do after</p>	<p style="text-align: right;">165</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 agreement, to me, which I interpret that as a</p> <p>3 noncompete agreement. And I think there was some</p> <p>4 noncompete language in there, I can't remember.</p> <p>5 But essentially, that's what the deal was</p> <p>6 was that, you know, in order for the sale to go</p> <p>7 through, I basically had to agree to this three-year</p> <p>8 deal.</p> <p>9 Q. And you interpreted the three-year deal as</p> <p>10 part of the sale of Strikeforce to the UFC as, at</p> <p>11 least in part, effectively a noncompete?</p> <p>12 A. That's correct.</p> <p>13 Q. That is, in the MMA industry?</p> <p>14 A. Yes.</p> <p>15 Q. So by March of 2014, that agreement had</p> <p>16 expired, and as of June of 2014, you became involved</p> <p>17 in Bellator, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And tell me about -- tell me about</p> <p>20 that. How did you become involved in Bellator?</p> <p>21 A. Had a meeting with Kevin Kay, and I was</p> <p>22 actually on my path to start another organization.</p> <p>23 And after meeting Kevin, I felt very comfortable in</p> <p>24 jumping on the Bellator ship and try to get them, you</p> <p>25 know, situated properly and make this a real</p>

<p style="text-align: right;">166</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 legitimate MMA company.</p> <p>3 Q. And prior to your involvement in Bellator</p> <p>4 in June of 2014, how would you characterize it as an</p> <p>5 MMA promoter?</p> <p>6 A. How would I characterize?</p> <p>7 Q. Bellator --</p> <p>8 A. Bellator.</p> <p>9 Q. -- as an MMA promoter before you got</p> <p>10 involved in June of 2014.</p> <p>11 A. Bellator was run by Bjorn Rebney, and at</p> <p>12 that time, I felt like it was a dying brand.</p> <p>13 Q. Why did you view Bellator as a dying brand</p> <p>14 before you got involved in June of 2014?</p> <p>15 A. I don't think it -- to me, the way I felt</p> <p>16 was it didn't have the respectability and the</p> <p>17 credibility of the MMA community, the managers, the</p> <p>18 fighters, and lacked star power.</p> <p>19 Q. And what do you mean it lacked star power?</p> <p>20 A. They didn't have very big names at</p> <p>21 Bellator.</p> <p>22 Q. Just so we're clear, I'm going to ask you a</p> <p>23 series of questions that are all pre of June '14.</p> <p>24 I'll try to preface them, make it clear if I'm asking</p> <p>25 something different, so I don't have to keep</p>	<p style="text-align: right;">168</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 you have an opportunity to develop an understanding</p> <p>3 of its financial condition?</p> <p>4 A. I'm not sure.</p> <p>5 Q. So you've been involved in the mixed</p> <p>6 martial arts industry since at least 2006, right?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And from 2006 to June of 2014 when</p> <p>9 you became involved in Bellator, do you know during</p> <p>10 what period of time within that time frame Bellator</p> <p>11 existed?</p> <p>12 A. Bellator started as a product that was</p> <p>13 created by the founder, Bjorn Rebney, I think they</p> <p>14 started in '06 or '07, and I can't be sure, it might</p> <p>15 have been later than that. They were not backed by</p> <p>16 Viacom at that time, and they were ESPN Deportes</p> <p>17 product, which was made for Spanish television.</p> <p>18 That's why they called it Bellator because in Latin,</p> <p>19 it means warrior.</p> <p>20 Q. So you were involved in the MMA industry</p> <p>21 for basically the whole time that Bellator was in</p> <p>22 business, right?</p> <p>23 A. Well, yes, but I mean, I would say that</p> <p>24 there's probably two years or a year-and-a-half that</p> <p>25 I basically unplugged and wasn't really actively on</p>
<p style="text-align: right;">167</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 repeating it and we understand each other.</p> <p>3 Before you got involved with Bellator in</p> <p>4 June of 2014 -- well, did you have an understanding</p> <p>5 as to why Bellator lacked, as you've used the term,</p> <p>6 star power before June of 2014?</p> <p>7 MS. GRIGSBY: Objection, foundation.</p> <p>8 THE WITNESS: My belief is that the founder</p> <p>9 and the promoter, Bjorn Rebney at that time, quite</p> <p>10 frankly, a lot of people didn't like him and didn't</p> <p>11 want to do business with him.</p> <p>12 So that makes it tough when you're trying</p> <p>13 to recruit fighters.</p> <p>14 BY MR. DELL'ANGELO:</p> <p>15 Q. Are there any other reasons that you can</p> <p>16 think of?</p> <p>17 A. You're talking specifically about 2014.</p> <p>18 Q. Before June of 2014 why Bellator didn't</p> <p>19 have big names or star power?</p> <p>20 MS. GRIGSBY: Objection, foundation.</p> <p>21 THE WITNESS: I think it comes to</p> <p>22 leadership, and I think that there was lacking --</p> <p>23 there was a lack of leadership.</p> <p>24 BY MR. DELL'ANGELO:</p> <p>25 Q. So when you joined Bellator in 2014, did</p>	<p style="text-align: right;">169</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 the websites or talking to people and really more</p> <p>3 focused on things that I wanted to do.</p> <p>4 Q. What period of time was that?</p> <p>5 A. That was from the time that Strikeforce</p> <p>6 closed until, let's say, March of '14.</p> <p>7 Q. So Strikeforce closed in March of '11,</p> <p>8 right? I think that's what you testified to.</p> <p>9 A. No. It was bought in March of '11, then it</p> <p>10 ran for a year-and-a-half.</p> <p>11 Q. I'm sorry. When you say closed, I was</p> <p>12 thinking the transaction closed. You mean the</p> <p>13 business closed?</p> <p>14 A. The business closed, yeah.</p> <p>15 So the last year-and-a-half, really, if I</p> <p>16 wanted to go to a fight, a UFC, I would call and they</p> <p>17 would arrange tickets. Other than that, I was doing</p> <p>18 a lot of personal things.</p> <p>19 Q. Okay. So from the time Bellator closed --</p> <p>20 excuse me. Withdraw that.</p> <p>21 From the time that Strikeforce closed in</p> <p>22 2013 to roughly March of 2014, you were not a student</p> <p>23 of the MMA industry; is that right?</p> <p>24 A. I was studying martial arts myself. I was</p> <p>25 traveling with my girlfriend and playing a lot of</p>

<p style="text-align: right;">170</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 golf.</p> <p>3 Q. You weren't a student of the MMA promotion</p> <p>4 industry or business, right?</p> <p>5 A. No.</p> <p>6 Q. So about three months later, you become</p> <p>7 involved in Bellator, correct? So June of 2014,</p> <p>8 about three months after you kind of emerged from</p> <p>9 your --</p> <p>10 A. Yes.</p> <p>11 Q. -- your hiatus, if you will? Okay.</p> <p>12 And so, from the time of March 2014 to the</p> <p>13 time of June 2014, did you study or research Bellator</p> <p>14 to try to understand it more and why it may have</p> <p>15 lacked star power?</p> <p>16 A. No. The mindset really wasn't to, you</p> <p>17 know, like to study anything, really. It was stop</p> <p>18 and smell the roses, unwind a little bit, just relax.</p> <p>19 Go on vacation, travel, you know, travel all over the</p> <p>20 world for a year-and-a-half, and then, play a lot of</p> <p>21 golf and just relax.</p> <p>22 Q. Right. Yes, I appreciate that. All I was</p> <p>23 really trying to understand is up to June of 2014 how</p> <p>24 dialed in you really were to Bellator's business and</p> <p>25 why, you know --</p>	<p style="text-align: right;">172</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 tilting? I go: I don't know. I go -- I had to</p> <p>3 think about that.</p> <p>4 And I said something to him, and I wanted</p> <p>5 to see how he'd react. And what I said was, I said:</p> <p>6 Kevin, you don't only have a black eye in the</p> <p>7 business, you have an orbital fracture, and I'm not a</p> <p>8 surgeon. I don't even know if I can help you.</p> <p>9 He said: Well, hey, think about it. I</p> <p>10 said: Well, I'll think about it.</p> <p>11 And I didn't call him back for a month</p> <p>12 because I wasn't looking for a job, I didn't want to</p> <p>13 be employed by anybody.</p> <p>14 But he kept calling me and talking. And</p> <p>15 the more I talked to him, I started feeling good</p> <p>16 about his vision.</p> <p>17 And so, finally, after much -- you know,</p> <p>18 thinking about it for two-and-a-half months, I said:</p> <p>19 You know what, F it. Let's go for it. I'm going to</p> <p>20 go and try my best and try to help build Bellator.</p> <p>21 And then, they made the move to remove Bjorn, and I</p> <p>22 came in two days later. And that was March of '14,</p> <p>23 yeah, March of '14.</p> <p>24 Q. In your estimation, as you just sort of</p> <p>25 articulated, was Bellator's lack of star power part</p>
<p style="text-align: right;">171</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 A. I had no idea. Honestly, it was Kevin Kay</p> <p>3 requesting a meeting, and I didn't even know who</p> <p>4 Kevin Kay was, to be honest with you. So I said,</p> <p>5 okay, I'll go meet him. But really, I'm going to go</p> <p>6 open another company. I remember telling some</p> <p>7 friends: I'm not in the business of building other</p> <p>8 people's businesses, I'm go to build my own business</p> <p>9 again and I'm going to go back and do this.</p> <p>10 And I sat down with Kevin Kay, and he's</p> <p>11 telling me what he's doing, telling me what he wants</p> <p>12 to do, wants to make a move in the top position.</p> <p>13 Originally, I thought he wanted me to work</p> <p>14 with Bjorn Rebney. I said, well, this is not -- you</p> <p>15 know, by committee, this is -- something that has to</p> <p>16 be very, you know -- somebody has to make the</p> <p>17 decision. I don't want to argue with somebody else.</p> <p>18 And I said, Kevin, I go, your brand has</p> <p>19 really been dented. And you know, I'm coming up off</p> <p>20 a very, very -- you know, time in my life where</p> <p>21 Strikeforce was great, I want to create something</p> <p>22 else great.</p> <p>23 I remember telling Kevin this. I said,</p> <p>24 your ship is kind of like the Titanic. You know? Do</p> <p>25 I want to jump on the Titanic as you guys are</p>	<p style="text-align: right;">173</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 of what made it like the Titanic in the MMA industry?</p> <p>3 A. I think it comes from leadership at the</p> <p>4 top, and it was that tournament format. To me, the</p> <p>5 tournament format, my belief is this -- and I worked</p> <p>6 for K-1 for eight years, which was the greatest</p> <p>7 tournament format, you know, entity ever, that and</p> <p>8 Pride.</p> <p>9 And you should do tournaments when you have</p> <p>10 eight stars because then, everybody can identify with</p> <p>11 these eight fighters, just like we did for the</p> <p>12 heavyweight tournament.</p> <p>13 These were tournament formats that were</p> <p>14 happening every week in a different city in a little</p> <p>15 town that, you know, a lot of people didn't hear</p> <p>16 about. You know, I didn't even know what some of</p> <p>17 these cities were. And a 1500, 1800-seat stadium.</p> <p>18 It just looked very small, very dark, very dingy, and</p> <p>19 the product was just subpar. And this is before, you</p> <p>20 know, Viacom came in and took it over.</p> <p>21 So that's what I was referring to. Kevin</p> <p>22 was like, you know. And he goes: Well, have you</p> <p>23 watched our product lately? I says: No, not really.</p> <p>24 And I really hadn't even watched one episode to that</p> <p>25 point. He goes: Well, check it out.</p>